

DONALD F. ZIMMER, JR. (State Bar No. 112279)  
KRISTA L. COSNER (State Bar No. 213338)

DRINKER BIDDLE & REATH LLP  
50 Fremont Street, 20<sup>th</sup> Floor  
San Francisco, California 94105  
Telephone: (415) 591-7500  
Facsimile: (415) 591-7510

SIOBHAN A. CULLEN (Bar No. 179838)  
DRINKER BIDDLE & REATH LLP  
333 South Grand Avenue, Suite 1700  
Los Angeles, CA 90071-1504  
Telephone: (213) 253-2300  
Facsimile: (213) 253-2301

Attorneys for Defendant  
SMITHKLINE BEECHAM CORPORATION  
dba GLAXOSMITHKLINE

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

ROGELIO LAROSA, INDIVIDUALLY,  
AND AS SUCCESSOR IN INTEREST OF  
THE ESTATE OF MILAGROS LAROSA,  
DECEASED, AND ERIC LAROSA,  
INDIVIDUALLY

Plaintiffs,

v.

SMITHKLINE BEECHAM  
CORPORATION dba  
GLAXOSMITHKLINE, a Pennsylvania  
Corporation; GLAXOSMITHKLINE PLC,  
and English public limited company;  
GLAXO WELLCOME UK LTD.,  
Uxbridge, Middlesex, UK; and  
GLAXOSMITHKLINE UK LIMITED,  
Brentford, Middlesex, UK

Defendants.

Case No. 07-CV-2356 WQH JMA

**JOINT MOTION EXTENDING  
DEFENDANTS' TIME IN WHICH TO  
RESPOND AND ORDER THEREON**

Pursuant to Local Rule 7.2 and this Court's Standing Orders, the parties jointly  
request this Court to enter an order based on the following stipulation:

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the  
parties to the above-captioned action, that the time within which defendant SmithKline

1 Beecham Corporation dba GlaxoSmithKline (“GSK”) may move, answer, or otherwise  
 2 respond to Plaintiffs’ Complaint is hereby extended until thirty (30) days after the initial  
 3 status conference held by the Honorable Cynthia M. Rufe, of the United States District  
 4 Court for the Eastern District of Pennsylvania, in the *In re Avandia Marketing, Sales*  
 5 *Practices and Products Liability Litigation*, MDL 1871.

6 IT IS FURTHER STIPULATED AND AGREED, by and between the  
 7 undersigned, that the time within which defendants GlaxoSmithKline plc, Glaxo  
 8 Wellcome UK Ltd., and GlaxoSmithKline UK Limited, without appearing and without  
 9 waiving any defenses to service, jurisdiction, venue or any other available defenses under  
 10 Rule 12 of the Federal Rules of Civil Procedure, may move, plead, or otherwise respond  
 11 to Plaintiffs’ Complaint is hereby extended until thirty (30) days after the initial status  
 12 conference held in the *In re Avandia Marketing, Sales Practices and Products Liability*  
 13 *Litigation*, MDL 1871.

14  
 15 /s/  
 16 Michael L. Baum (Bar No. 119511)  
 17 Ronald L.M. Goldman (Bar No. 33422)  
 18 Roger D. Drake (Bar No. 237834)  
 19 BAUM, HEDLUND, ARISTEI &  
 20 GOLDMAN, PC  
 12100 Wilshire Boulevard, Suite 950  
 Los Angeles, CA 90025-7114

21 Counsel for Plaintiffs

/s/  
 Donald F. Zimmer, Jr. (Bar No. 112279)  
 Krista L. Cosner (Bar No. 213338)  
 DRINKER BIDDLE & REATH LLP  
 50 Fremont Street, 20<sup>th</sup> Floor  
 San Francisco, CA 94105-2235

Sean P. Fahey (Pa. Bar No. 73305)  
 PEPPER HAMILTON, LLP  
 3000 Two Logan Square  
 18<sup>th</sup> & Arch Streets  
 Philadelphia, PA 19103

Counsel for Defendant  
 SmithKline Beecham Corporation  
 dba GlaxoSmithKline